

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

*In Re* Petition of Marginalised Affected Property  
Owners,  
*Applicant,*

Civil Action No. 1:21-mc-00681

For an Order Granting Leave to Issue Subpoenas  
To BSG Resources Limited, Alvarez & Marsal  
Holdings, LLC, and Cleary Gottlieb Steen and  
Hamilton, LLP, for Taking of Discovery Pursuant  
to 28 U.S.C. § 1782

**STIPULATED ORDER**

WHEREAS, Petitioner and Respondent BSG Resources Limited, appearing through its Joint Administrators in bankruptcy (“BSGR”), wish to resolve this matter without Court intervention; and

WHEREAS, Petitioner and Respondent BSGR have come to agreement on a plan for review of the documents produced to Petitioner and determination of any confidentiality needs,

NOW THEREFORE, it is hereby stipulated and agreed, by and between Petitioner and Respondent BSGR, that:

1. By no later than November 10, 2023, Respondent BSGR shall complete its confidentiality review of 126 documents identified by Petitioner.
  - a. For any document for which BSGR wishes to assert any degree of confidentiality protection, in whole or in part, BSGR shall state good-faith reasons pursuant to the standards of Rule 26 of the Federal Rules of Civil Procedure.
  - b. To the extent that confidentiality is asserted for portions of documents,

BSGR shall provide redactions on the same date.

- c. For any document for which BSGR does not respond, Petitioners' confidentiality obligations shall be terminated.

2. By December 1, 2023, Petitioner and Respondent BSGR shall submit a joint status report to the Court. Such status report shall include:

- a. The results of the initial review of the 126 documents, with the submission of any remaining disputes over confidentiality to the Court.
- b. The parties' proposal regarding confidentiality review of the remainder of the documents produced. To the extent the parties cannot agree on a joint proposal, the parties shall state their respective positions, including whether additional briefing is necessary (and if so, a schedule for submitting such briefing).

SO ORDERED this 30 day of October, 2023.



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ONA T. WANG  
United States Magistrate Judge